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A PROFESSIONAL LIMITED LIABILITY COMPANY

October 17, 2024

Via ECF:

The Honorable Naomi Reice Buchwald
United States District Court Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: **Crystal McKinney v. Combs, et. al.**
(Case: 24-cv-03931-NRB)

Your Honor:

We represent Plaintiff Crystal McKinney in the above-referenced matter and write jointly with Defendants Sean Combs a/k/a “P. Diddy,” Bad Boy Entertainment LLC d/b/a Bad Boy Records, Bad Boy Entertainment Holdings, Inc., Sean John Clothing LLC, and Daddy’s House Recordings, Inc.. On September 20, 2024, Defendants submitted a pre-motion conference regarding their anticipated Motion to Dismiss, and on September 25, 2024, Plaintiff filed an opposition letter in reply. (ECF No. 26, 27). On October 01, 2024, Your Honor ordered “the parties should confer on a briefing schedule agreeable to both sides, in which no more than sixty days elapse from the filing of defendant’s motion to the filing of defendants’ reply.” (ECF No. 28).

The parties met-and-conferred and propose the following dates:

- Defendants’ Motion to Dismiss will be due on November 08, 2024
- Plaintiff’s Opposition will be due on December 6, 2024
- Defendants’ Reply will be due on January 7, 2025

We appreciate your consideration.

Respectfully Submitted,

**PHILLIPS & ASSOCIATES
ATTORNEYS AT LAW, PLLC**



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